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VIA ECF & E-MAIL

Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Sergio Lorenzo Rodriguez*, 20 Cr. 513 (AT)

Dear Judge Torres:

I represent Sergio Lorenzo Rodriguez in the above-entitled matter and submit this letter to respectfully request a two-month adjournment of his surrender date, from February 13, 2023 to April 13, 2023. I have consulted with the government and they do not consent to this request.

As this Court is aware, I was assigned to represent Mr. Rodriguez shortly after he was sentenced on December 14, 2022. I have reviewed the relevant case materials and had numerous conversations with my client since my assignment. Mr. Rodriguez has grown concerned that he will be unable to properly get his affairs in order prior to his current surrender date in little over one month from now.

First, Mr. Rodriguez works full-time and rents an apartment where he lives by himself. He will be unable to afford a storage facility for his personal property during his prison term. Although he has made some progress, the task of finding friends or family members to agree to hold all of his personal property during his incarceration has proved more daunting than he anticipated. Should he be permitted to postpone his surrender date to April 13, 2023, this will provide sufficient time for him to secure all of his property and avoid the need to merely dispose of it (or have his landlord dispose of it, thus negating his security deposit).

Second, and more importantly, Mr. Rodriguez is a critical caregiver for his ill mother. He is currently discussing with his family members a transitional plan that can substitute his care for a patchwork of other family members. However, Mr. Rodriguez is quite concerned that if he is required to surrender next month, an alternative, family-based care plan will not be in place for his mother. He is confident that if his surrender is postponed until April 13, 2023, this will provide sufficient time for the family to set up such a care plan.

Thank you for your consideration of this request.

Respectfully submitted,

Ken Womble

Ken Womble
Counsel for Sergio Lorenzo Rodriguez

GRANTED in part, DENIED in part. Defendant,
Sergio Rodriguez, shall surrender for service of his
sentence on **March 15, 2023**.

SO ORDERED.

Dated: January 11, 2023
New York, New York



ANALISA TORRES
United States District Judge